

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America

v.

James Fletcher IV

Case No.

3:19-mj-4128

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17, 2019 to May 5, 2019 in the county of Davidson in the
Middle District of Tennessee, the defendant(s) violated:

Code Section

Title, 18, United States Code,
Sections 922(u) and 922(j)

Offense Description

Theft from a federal firearms licensee and possession of a stolen firearm

This criminal complaint is based on these facts:

Please see the attached statement in support of criminal complaint.

☒ Continued on the attached sheet.



Complainant's signature

ATF S/A Ryan Singleton

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/10/2019

City and state: NASHVILLE, TN



Judge's signature

Alistair E. Newbern, United States Magistrate Judge

Printed name and title

STATEMENT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ryan E. Singleton, being first duly sworn on oath, state as follows:

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) in Nashville, Tennessee and have been employed as an ATF agent since January 2010. Prior to my employment with the ATF, I was a criminal investigator and a patrol officer with the Waynesville Police Department in Waynesville, North Carolina for over 11 years.
2. This affidavit is submitted in support of a Criminal Complaint for the arrest of James FLETCHER IV for theft from a federal firearms licensee, in violation of Title 18, United States Code, Section 922(u) and being in possession of a stolen firearm, in violation of Title 18, United States Code, Section 922(j).
3. The facts contained in this statement are based on first-hand knowledge or information learned during this investigation from other law enforcement sources or witnesses related to the investigation. This statement does not provide each and every detail known by me regarding this investigation, but rather provides information necessary to establish probable cause for the arrest of the referenced suspect for the stated offense. Except where indicated, all statements referred to below are set forth in substance and in part, rather than verbatim.
4. On April 17, 2019, at approximately 1:40 A.M., Huck Defense, a Federal Firearms Licensee (FFL), located at 4706 Old Hickory Blvd, Old Hickory (Davidson County), Tennessee 37138 was burglarized, which resulted in the theft of five firearms and one P-Mag A.R. style 30 round magazine.
5. Officers of the Metropolitan Nashville Police Department's (MNPd) Hermitage Precinct responded to the business and met with the owner, D.R. D.R. conducted an inventory of his business, and discovered the below listed items were taken during the burglary:
 - Glock, model 19 (cutaway training model), 9mm pistol with serial #JQ3113
 - Subcompact generation 3 Glock frame with serial #BCTD618
 - Glock, model 19, 9mm pistol with serial #WHD799
 - Glock, model 19, 9mm pistol with serial #BGNL494
 - Star, AR style rifle converted to "can cannon" with serial #DS31636
 - P-Mag, 30 round AR style magazine
6. Huck Defense utilizes surveillance cameras in their business and was able to provide MNPd a copy of the video taken during the burglary. This surveillance footage was reviewed by law enforcement officers. The surveillance video from the time of the burglary showed that two individuals, with their faces covered with clothing, approached the front of the Huck Defense building. The surveillance footage showed that one of the individuals

broke out one of the front windows with a hammer and both suspects entered the store and removed the above listed items. Both suspects left the store through the same broken out window and left the area.

7. On April 17, 2019, SAs Welch, Wiest, and Singleton responded to the scene along with MNPB Detectives Hambrick and Studer. SAs and Detectives canvassed the surrounding businesses for surveillance video that could show the suspects before and after the burglary. Investigators received surveillance video from the owner of HiFive Supply. HiFive Supply is located directly beside Huck Defense in the business complex and their surveillance video captured the suspects running to and from Huck Defense. Additionally, investigators obtained a copy of surveillance video from Hermitage Coin Laundry, which is three businesses down from Huck Defense. Hermitage Coin Laundry surveillance video captured the suspects before and after the burglary, and possibly captured a suspect vehicle.
8. On Sunday, May 5, 2019, at approximately 12:00 A.M., Nashville Airport Police Officer Drown made a traffic stop on Donelson Pike near I-40 in front of the Nashville International Airport on a 2012 black Cadillac Escalade for making an illegal lane change. When Officer Drown ran the license plate displayed on the Escalade it came back to a different vehicle, a black 2012 Infinity 4 door vehicle. Officer Drown approached the vehicle and detected the odor of marijuana coming from the driver's side of the vehicle. The driver of the vehicle, James FLETCHER IV, admitted that there was a blunt in the vehicle. Officer Drown conducted a probable cause search of the vehicle and located four (4) grams of marijuana in a plastic bag in the center console and a loaded Glock 19, 9mm, semi-automatic handgun (serial #BGNL494) with an extended 34 round magazine, which was one of the firearms stolen from Huck Defense FFL. The passenger of the vehicle, later identified as Mr. Jevon WILSON, fled from the scene on foot and, at the time of his flight, had an active Felony Warrant for his arrest for Especially Aggravated Robbery with a Deadly Weapon.
9. Officer Drown took FLETCHER into custody and transported him to the Department of Public Safety. FLETCHER attempted to contact Mr. WILSON via cell phone to determine his whereabouts, but was unsuccessful. FLETCHER allowed Officer Drown to go through his phone (at FLETCHER's direction) to obtain phone numbers that he (FLETCHER) wanted. During this process of searching for phone numbers at FLETCHER's direction, Officer Drown observed a photo of FLETCHER holding the stolen Glock (the same stolen Glock that was just recovered in his vehicle) while wearing the same clothes that he was wearing at the time of the instant arrest. FLETCHER admitted that he was holding the stolen Glock but stated that the stolen Glock was not his. Officer Drown also observed messages discussing weapons and drug transactions and FLETCHER then stated that he did not want Officer Drown going through the phone anymore. Officer Drown stopped looking through the phone but seized FLETCHER's phone based on the evidence he had already observed.

10. On May 8, 2019, Nashville Airport Police Detective Kessler obtained a state search warrant to have FLETCHER's cell phone examined and turned the phone over to me to conduct the examination.
11. On May 9, 2019, I conducted a forensic examination on FLETCHER's cell phone. During the examination, I located texts between FLETCHER and WILSON on April 16, 2019 (the evening before Huck Defense burglary) in which the two discussed obtaining firearms. Additionally, I found a text FLETCHER sent on April 17, 2019 (the morning of the burglary) at approximately 8:26 A.M. (which was after the time of the burglary) in which FLETCHER told the recipient that he just broke into a gun store. There were additional text messages between FLETCHER and WILSON that discussed looking for other gun stores to break in to; specifically, WILSON asked FLETCHER if FLETCHER had looked up gun stores, to which FLETCHER texted back that there were some (meaning gun stores) close by. WILSON then texted FLETCHER to tell him (FLETCHER) to make sure the gun stores do not have bars on the windows.
12. In addition to the text messages, FLETCHER's web searches on his phone show that FLETCHER searched for Glock slides (the upper part of the firearm that is added to a frame to complete the firearm) after the burglary. Additionally, FLETCHER searched for "Glock cutaway slide" on his phone, which was a specific feature on one of the firearms taken during the burglary.
13. I have reviewed the surveillance video obtained during this investigation, and FLETCHER and WILSON match the height and weight and general physical characteristics of the two suspects observed committing the burglary on the video surveillance.
14. The aforementioned events occurred in Davidson County, located in the Middle District of Tennessee.
15. Based on the forgoing facts, I submit that there is probable cause to believe that James FLETCHER IV committed the offenses of theft from a federal firearms licensee, in violation of Title 18, United States Code, Section 922(u) and being in possession of a stolen firearm, in violation of Title 18, United States Code, Section 922(j).